## EXHIBIT 3

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHAMARA T. KING, on behalf of herself and all others similarly situated,

Plaintiff,

v.

Case No.: 2:10-cv-06850-PBT

GENERAL INFORMATION SERVICES, INC.,

Defendants.

## DECLARATION OF LORI C. WEBB IN OPPOSITION TO PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

Pursuant to 28 U.S.C. § 1746, I, Lori Webb, declare as follows:

- 1. My name is Lori Webb. I am over 21 years of age and am competent to give testimony. I am the Senior Vice President of Operations for General Information Services, Inc. ("GIS"). The facts herein are based upon my personal knowledge and my review of the business records of GIS.
- 2. I have reviewed the allegations that Plaintiff Shamara T. King has made against GIS in case number 2:10-cv-06850-PBT currently pending in the United States District Court for the Eastern District of Pennsylvania.
- I am familiar with GIS's policies and procedures for preparing consumer reports.
  I am also familiar with GIS's systems for preparing consumer reports.
- 4. Based on GIS's clientele and the types of reports that GIS prepares, GIS produces employment-purpose consumer reports for individuals seeking employment at an annual salary which equals \$75,000 or more.

- 5. GIS does not collect information from its customers about the salary of the positions for which consumers are applying when GIS prepares employment-purpose consumer reports.
- 6. It is not apparent from the face of any consumer report that GIS prepares whether the report was prepared in connection with the employment of any individual at an annual salary which equals \$75,000 or more.
- 7. GIS does not have any information in its database or other files from which GIS could determine the salary of positions applied for in connection with employment-purpose consumer reports that GIS has prepared.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day of April, 2013.

LORI C. WEBB